

Keenan, J

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLENCLOVA INVESTMENT CO., a Cayman Islands corporation,
Plaintiff,

- against -

TRANS-RESOURCES, INC., a Delaware corporation, and TPR
INVESTMENT ASSOCIATES, INC., a Delaware corporation,
Defendants.

Defendants.

TPR INVESTMENT ASSOCIATES, INC.,

Third-Party Plaintiff,

- against -

ARIE GINGER,

Intervenor Defendant, Third Party
Defendant and Counterclaim Plaintiff

ARIE GINGER,

Counterclaim Plaintiff

- against -

GLENCLOVA INVESTMENT CO., and TPR INVESTMENT
ASSOCIATES, INC.,

Counterclaim Defendants

- and -

SAGI GINGER, DALIA GINGER, THE SAGI GINGER 1993
TRUST, ROCHELLE FANG, Individually and as Trustee of the
SAGI GINGER 1993 TRUST, TR INVESTORS, LLC, NEW TR
EQUITY I, LLC AND NEW TR EQUITY II, LLC,

Additional Defendants on the
Counterclaim

Case No. 08-CV7140 (JFK)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11-7-11


STIPULATION AND PROPOSED SCHEDULING ORDER

WHEREAS, at the November 3, 2011 pre-motion conference, the parties indicated their intention to file the following motions (the "Motions") and the Court directed counsel to confer on a schedule therefor: (i) Arie Genger's motion to dismiss or stay this action; (ii) the Trump Group's motion for an injunction against Arie and Orly Genger and to stay this action pending completion of the plenary proceedings in the Delaware Court of Chancery; and (iii) TPR's motion to stay further proceedings in the state courts of New York and Delaware and to consolidate this action with the related proceeding pending before this Court with Case No. 11 Civ. 5602 (JFK); and

WHEREAS, the parties have agreed to a schedule for further briefing on the Motions;

NOW, THEREFORE, IT IS STIPULATED AND AGREED that, subject to the Court's approval, briefing on the Motions shall be as follows: opening briefs due on or before November 18, 2011, answering briefs due on or before December 7, 2011, and reply briefs due on or before December 14, 2011, with oral argument to be scheduled at the convenience of the Court.

Dated: November 4, 2011

SKADDEN, ARPS, SLATE, MEADHER & ELOM LLP

William P. Frank
(william.frank@skadden.com)
Four Times Square
New York, New York 10036
(212) 735-3000

- and -

Thomas J. Allingham II
(thomas.allingham@skadden.com)
Anthony W. Clark (admitted *pro hac vice*)
(anthony.clark@skadden.com)
One Rodney Square

P.O. Box 636
Wilmington, Delaware 19899-0636
(302) 651-3000
*Attorneys for Plaintiff and Counterclaim Defendant Glen-
clova Investment Co. and Additional Counterclaim De-
fendants TR Investors, LLC, New TR Equity I, LLC and
New TR Equity II, LLC*

Dated: November 4, 2011

DUANE MORRIS, LLP

s/ John Dellaportas, w/ permission wfx

John Dellaportas
(dellajo@duanemorris.com)
1540 Broadway
New York, New York 10036
(212)

*Attorneys for Defendant, Third Party Plaintiff and Coun-
terclaim Defendant TPR Investment Associates, Inc. and
Additional Counterclaim Defendant The Sagi Genger 1993
Trust*

Dated: November 4, 2011

MCLAUGHLIN & STERN, LLP

s/ Alan Sash, w/ permission. wfx

Alan Sash
(asash@mclaughlinstern.com)
260 Madison Avenue
New York, NY 10016
(212) 448 1100

*Attorneys for Additional Counterclaim Defendant Sagi
Genger*

Dated: November 4, 2011

PEDOWITZ & MEISTER LLP

s/ Robert A. Meister, w/ permission wfx

Robert A. Meister
(robert.meister@pedowitzmeister.com)
1501 Broadway
New York, NY 10036
(212) 403-7330

*Attorneys for Additional Counterclaim Defendant Dalia
Genger*

Dated: November 4, 2011

MITCHELL, SILBERBERG & KNUPP LLP

/s/ Lauren J. Wachtler, w/ permission, w/ [initials]

Lauren J. Wachtler

(ljw@msk.com)

12 East 49th Street, 30th Floor

New York, New York 10017-1028

(212) 509-3900

Attorneys for Intervenor Defendants, Third Party Defendant and Counterclaim Plaintiff Arie Genger

Dated: November 4, 2011

LYONS MCGOVERN, LLP

/s/ Desmond C.B. Lyons, w/ permission, w/ [initials]

Desmond C.B. Lyons

(dlyons@lyons-mcgovern.com)

399 Knollwood Road, Suite 216

White Plains, New York 10603

(914) 631-1336

Attorneys for Additional Counterclaim Defendant Rochelle Fang, Individually and as Trustee of the Sagl Genger 1993 Trust

IT IS SO ORDERED,
this 7 day of December, 2011.

/s/ John F. Keenan

John F. Keenan

United States District Judge

[Handwritten flourish]